IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
JEFFERSON CITY DIVISION

MYRTLE SIMPSON, 125 Point Lookout Dr. St. Robert, Missouri 65584 Plaintiff, vs. REGENT ASSET MANAGEMENT SOLUTIONS 7290 Samuel Dr., Suite 300 Denver, CO 80221 Defendant.	))))))))))))))	Case No. Division No.

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

MYRTLE SIMPSON (Plaintiff), by her attorneys, KROHN & MOSS, LTD., alleges the following against REGENT ASSET MANAGEMENT SOLUTIONS(Defendant):

INTRODUCTION

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, *15 U.S.C. 1692 et seq.* (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to *15 U.S.C. 1692k(d)*, which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."
3. Defendant conducts business in the state of Missouri, and therefore, personal jurisdiction is established.
4. Venue is proper pursuant to *28 U.S.C. 1391(b)(2).*
5. Declaratory relief is available pursuant to *28 U.S.C. 2201 and 2202*.

PARTIES

6. Plaintiff is a natural person residing in St. Robert, Pulaski County, Missouri.
7. Plaintiff is a consumer as that term is defined by *15 U.S.C. 1692a(3)*, and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by *15 U.S.C. 1692a(5)*.
8. Defendant is a debt collector as that term is defined by *15 U.S.C. 1692a(6)*, and sought to collect a consumer debt from Plaintiff.
9. Defendant is a collection agency with a business office located in Denver, Colorado.
10. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

FACTUAL ALLEGATIONS

11. The original creditor of the alleged debt is US Bank and the amount of the alleged debt is one-thousand two hundred dollars ($1,200.00).
12. Defendant constantly and continuously places collection calls to Plaintiff seeking and demanding payment for the alleged debt.
13. Defendant places collection calls to Plaintiff from telephone number (866) 886-7390 approximately two (2) to three (3) times a day seeking and demanding payment for the alleged debt.
14. Defendant's representative made offensive remarks to Plaintiff by stating "you need to do something about this settlement right now or we are going to have to put more charges on it."

COUNT I
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

15. Defendant violated the FDCPA based on the following:

    a. Defendant violated *§1692d* of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt.

    b. Defendant violated *§1692d(2)* of the FDCPA by using abusive language when speaking to Plaintiff by stating that she needs to "you need to do something about this settlement right now or we are going to have to put more charges on it."

    c. Defendant violated *§1692d(5)* of the FDCPA by causing a telephone to ring repeatedly and continuously with the intent to annoy, abuse, and harass Plaintiff

WHEREFORE, Plaintiff, MYRTLE SIMPSON, respectfully requests judgment be entered against Defendant, REGENT ASSET MANAGEMENT SOLUTIONS, for the following:

16. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,
17. Statutory damages pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k,*
18. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*
19. Any other relief that this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED,

By:/s/ Adam Maxwell
Adam Maxwell
Missouri Bar Number: 62103
Attorney for Plaintiff
Krohn & Moss, Ltd.
120 W. Madison Street, 10th Floor
Chicago, IL 60602
(312) 578-9428 x281
e-mail: amaxwell@consumerlawcenter.com

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, MYRTLE SIMPSON, hereby demands trial by jury in this action.

VERIFICATION OF COMPLAINT AND CERTIFICATION

(STATE OF MISSOURI)

Plaintiff, MYRTLE SIMPSON, states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, MYRTLE SIMPSON, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

25 March 2010
Date

Myrtle Simpson
MYRTLE SIMPSON